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FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII
Sep 20, 2018
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Attorneys for the
United States of America

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	MAG. NO. 18-1049 RLP
)	
Plaintiff,)	CRIMINAL COMPLAINT;
)	AFFIDAVIT IN SUPPORT OF
VS.)	CRIMINAL COMPLAINT
)	
ABEL J. SOUZA JR.)	
)	
Defendant.)	
)	

CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn,
state the following is true and correct to the best of my
knowledge and belief.

COUNT 1

On or about September 19, 2018, in the District of
Hawaii, the defendant, **ABEL J. SOUZA JR.**, did knowingly and
intentionally attempt to possess, with intent to

distribute, 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

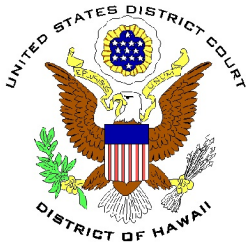
I further state that I am a United States Postal Inspector of the United States Postal Inspection Service (USPIS), and that this Complaint is based upon the facts set forth in the attached "Affidavit in Support of Criminal Complaint", which is incorporated herein by reference.

DATED: September 20, 2018, HONOLULU, HAWAII.



BRIAN W. SHAUGHNESSY
U.S. Postal Inspector, USPIS

Sworn under oath before me telephonically,
and attestation acknowledged pursuant
to Fed. R. Crim. P. 4.1(b)(2),
this 20th day of September, 2018.



Kenneth J. Mansfield
United States Magistrate Judge

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

BRIAN W. SHAUGHNESSY, after being duly sworn, deposes and states as follows:

1. I am a United States Postal Inspector of the United Postal Inspection Service (USPIS), assigned to the Honolulu Domicile of the USPIS in Honolulu, Hawaii. I have been so employed since January 2007. In the course of my employment with the USPIS, I have conducted investigations involving the criminal misuse of the U.S. Mail, including Title 21 controlled substances, through the U.S. Mail. During my career with the USPIS, I have conducted, and been involved in, more than 100 financial fraud investigations and approximately 41 drug investigations. As a result of my training and experience, I am familiar with the common practices utilized by drug traffickers to smuggle drugs and money through the U.S. Mail.

2. During this time I have become knowledgeable with the enforcement of Federal laws pertaining to narcotics and dangerous drugs. Based on this experience, I have become well versed in the methodology utilized in narcotics trafficking operations, the specific types of language used by narcotics traffickers, the unique trafficking patterns employed by narcotics organizations and their patterns of drug abuse.

3. On or about July 24, 2018, a "parcel watch" was placed on 5760 Kuamoo Road, Kapaa, HI 96746, pursuant to an ongoing investigation.

4. On September 17, 2018, I was notified that four Priority Mail Flat Rate envelopes, all addressed to 5760 Kuamoo Road, Kapaa, HI 96746, had arrived for delivery to the Kapaa Post Office on the Island of Kauai. Later that day all four envelopes were mailed to me in Honolulu, Hawaii, for further investigation.

5. On September 18, 2018, I applied for, was granted and executed federal search warrant bearing Magistrate Number 18-1034 RLP on the four Priority Mail Flat Rate envelopes addressed to 5760 Kuamoo Road, Kapaa, HI 96746. Each envelope contained approximately 255 gross grams of a white crystalline substance which field-tested positive for the presence of methamphetamines.

6. On September 19, 2018, a Kauai Police Department (KPD) Investigative Services Bureau officer obtained a search warrant in State of Hawaii, Fifth Circuit Court, for the installation and monitoring of a beeper device for one of the Priority Mail Flat Rate envelopes (Subject Envelope #1) addressed to 5760 Kuamoo Road, Kapaa, HI 96746. Investigators removed the methamphetamine from Subject Envelope #1 and installed pseudo-methamphetamine and the

monitoring device that would emit a signal indicating to investigators that Subject Envelope #1 had been opened. Investigators left an approximate 30-gram sample of methamphetamine within Subject Envelope #1.

7. On September 19, 2018, a controlled delivery operation was conducted at 5760 Kuamoo Road, Kapaa, HI 96746. At approximately 1:20 PM HST, a U.S. Postal Inspector acting in an undercover capacity as a United States Postal Service letter carrier delivered Subject Envelope #1 to the carport area at 5760 Kuamoo Road, Kapaa, HI 96746.

8. At approximately 4:22 PM HST, a male later identified as Abel J. SOUZA Jr., arrived at 5760 Kuamoo Road in Kapaa in a blue Ford F-150 pickup truck bearing Hawaii license plate AJS JR. At approximately 4:26 PM HST a rapid tone was emitted by the beeper indicating the subject envelope had been opened.

9. Approximately one minute later, the same Ford F-150 truck exited the residence and turned right onto Kuamoo Road. The vehicle then turned left onto Mala Street, where officers attempted to make contact with the vehicle. However, the vehicle fled in a dangerous manner and sped away driving east on Kuamoo Road towards the Opaekaa Falls lookout area. The vehicle eventually turned right onto a

dirt road off of Kuamoo Road where it stopped, and the operator of the vehicle, Abel J. SOUZA Jr. was arrested by KPD officers at approximately 4:31 PM HST.

10. During a post-Mirandized statement, SOUZA stated he resided at 5760 Kuamoo Road, and that he was expecting to receive four envelopes via the U.S. Mail containing a total weight of one kilogram of crystal methamphetamine. SOUZA said he opened the envelope which had been delivered to his residence and immediately noticed that a beeper was inside the envelope.

11. SOUZA further stated he then drove from his residence in possession of the beeper and methamphetamine, and shortly thereafter noticed the police car with its lights on behind him. SOUZA admitted to throwing the beeper and narcotics out his window while speeding away from law enforcement officers at a high rate of speed.

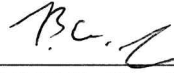
12. SOUZA said he paid \$6,000.00 for this kilogram of methamphetamine and that he sells it to various individuals for approximately \$700.00 to \$800.00 per ounce.

13. Based on my training and experience, the possession of this quantity of methamphetamine and the manner in which it was packaged is not consistent with personal use but rather is consistent with distribution.

14. Methamphetamine is a Schedule II controlled

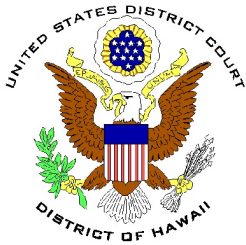
substance.

FURTHER AFFIANT SAYETH NAUGHT.



BRIAN W. SHAUGHNESSY
U.S. POSTAL INSPECTOR, USPIS

Sworn to under oath before me telephonically,
and attestation acknowledged pursuant
to Fed. R. Crim. P. 4.1(b)(2),
this 20th day of September, 2018.



Kenneth J. Mansfield
United States Magistrate Judge